

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the  
Commission's Procurement Incentive Framework and  
to Examine the Integration of Greenhouse Gas  
Emissions Standards into Procurement Policies.

R. 06-04-009

**COMMENTS  
OF THE ALLIANCE FOR RETAIL ENERGY MARKETS  
ON STAFF REPORTING PROPOSAL**

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Date: July 2, 2007

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the  
Commission's Procurement Incentive Framework and  
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**COMMENTS  
OF THE ALLIANCE FOR RETAIL ENERGY MARKETS  
ON STAFF REPORTING PROPOSAL**

In accordance with the Administrative Law Judge's ("ALJ") ruling of June 12, 2007 (hereafter, the "June 12 Ruling"),<sup>1</sup> the Alliance for Retail Energy Markets ("AReM") respectfully submits the following comments on the report entitled "Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol" (hereafter, the "Staff Proposal").<sup>2</sup>

**I. INTRODUCTION**

AReM commends Staff for developing a detailed proposal for the tracking and reporting of greenhouse gas ("GHG") emissions associated with retail sales of electricity within California. AReM appreciates that the Staff Proposal recognizes "[e]lectricity markets and the physical systems used to produce and deliver electricity are exceedingly complex."<sup>3</sup> AReM also appreciates the commitments in the Staff Proposal for the Public Utilities Commission and the Energy Commission to continue "to refine the methodologies used to estimate GHG emissions

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<sup>1</sup> ALJ's Ruling Regarding Comments on Staff Reporting Proposal, June 12, 2007, pp. 4-5.

<sup>2</sup> AReM is a California mutual benefit corporation whose members are electric service providers that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of particular members or any affiliates of its members with respect to the issues addressed herein.

<sup>3</sup> Staff Proposal, p. 6.

associated with unspecified sources” and “working with other parties to explore generation information systems and tracking mechanisms that could largely automate the attribution of emissions to particular parties.”<sup>4</sup> Of particular note in this regard, the California Air Resources Board (“CARB”) Market Advisory Committee recently released a report in which it recommends a mechanism for tracking and reporting protocols based on what is described in the report as the “first-seller” approach. AReM believes that the “first seller” approach is preferable and will better meet the criteria against which the CEC and CPUC are evaluating various proposed reporting protocols—accuracy, consistency, simplicity, transparency, minimization of unintended consequences, setting the appropriate policy signals, and expandability.<sup>5</sup>

AReM also strongly urges the CEC and CPUC to continue conferring directly with the Western Renewable Energy Generation Information System (“WREGIS”) Board to modify WREGIS so that it can also track GHG emissions associated with retail sales and facilitate the trading of emissions credits/allowances. Meanwhile, the Staff Proposal should be adopted on an interim basis only (until a WREGIS-based tracking and reporting system is in place), and should be modified to:

- Clarify that retail sellers will not be held accountable for “contract shuffling” for which they are not responsible.
- Reduce the additional reporting burden on retail sellers for purchases from specified out-of-state resources.
- Allow for documented claims of low or zero emissions associated with new contracts with existing resources without any “limiting conditions.”
- Carefully consider whether the differences in the levels of GHG emissions attributed to “unspecified purchases” from different power pools should be changed so as to

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<sup>4</sup> *Id.*

<sup>5</sup> *See* Staff Proposal, pp. 6-7.

avoid exacerbating transmission congestion problems and the need for constant revision of the emission factors attributed to different pools.

These issues are discussed in more detail in Section III below. For purposes of the discussion in Section III, AReM has followed the outline of the Staff Proposal as requested in the June 12 Ruling. AReM first responds, however, to the questions posed by the ALJ in the June 12 Ruling in Section II below.

## **II. RESPONSES TO ALJ QUESTIONS**

The questions posed in the June 12 Ruling and AReM's responses thereto are as follows:

- **Whether the criteria for assessing reporting protocols identified in Section 2.3 of the report are appropriate, and whether the Staff proposal adequately complies with what you view as appropriate criteria.**

While AReM believes that the identified criteria are appropriate to be used when considering the reporting program as described under § 3.2 (i.e., accuracy, consistency, simplicity, transparency, minimization of unintended consequences, setting appropriate policy signals, and expandability), there are some additional issues that arise when analyzing the Staff Proposal with these criteria:

As entities that are in direct competition with each other and with the IOUs over a currently limited universe of customers, AReM's members are particularly sensitive to the potential disclosure of market sensitive information regarding their wholesale procurement needs. Some of the discussion in the report speaks of relatively rapid reporting on transactions, including some reports shortly after settlement data is secured. Any reporting program established must maintain the confidentiality of market sensitive information and avoid disclosure of detailed transaction data inside the "window of confidentiality" concept adopted by the Commission in D.06-06-066. Information outlined in the report, particularly portions of

Sections 1, 3, 4 and 8 of the draft template should not be made immediately public.<sup>6</sup>

Unfortunately, confidentiality concerns about release of otherwise confidential market-sensitive data are not addressed in the Staff Proposal. This critical oversight should be addressed in a subsequent update to the proposal and put out for additional comments before presented to the Commissions for adoption. AReM notes that the criteria of transparency as described in the Staff Proposal is not compromised by maintaining confidentiality of elements of the draft reporting template that would otherwise lead to disclosure of market-sensitive data. Aggregated data can be made public that masks individual LSEs' market activities and procurement needs while providing the necessary assumptions for derived emission factors.

The information sharing goal in Section 5.3.4 of the Staff Proposal needs to address confidentiality concerns to provide timely access to the most efficient sources of data while maintaining data confidentiality.

It is unclear what "financial settlement data" is being referenced in Section 5.6 as the "most accurate information of purchases." Is this the final monthly CAISO settlement reports or settlement data for individual transactions between buyers and sellers that may be self-scheduled through the CAISO? This type of data is extremely market sensitive and AReM expects parties to be very reluctant to release this information. Accordingly, an updated Staff Proposal should address what is assumed to be available through this information and how commercially sensitive information would be protected, as well as how it relates to the verification processes.

The reporting frequency suggested in Section 8.2 is a driver to the previously noted confidentiality concerns, and it also raises an administrative burden issue. Annual reports are preferable, and should be required after the annual historic load reporting to the CEC/CPUC for

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<sup>6</sup> The CPUC confidentiality rules would maintain historic materials in confidence for a minimum period of 1 year. See D.06-06-066.

RAR program purposes. The suggestion for quarterly reporting, although not proposed here, should be rejected for retail providers, particularly if generation facilities are providing that information to the CEC or EPA.

AReM believes the frequency of reporting is also related to the overall structure of the compliance program yet to be developed. As discussed in Section III, however, the proposed protocols could and should be modified to increase simplicity by avoiding duplicative reporting of data that is already publicly available, and to minimize unintended consequences associated with predictable changes in seller behavior in response to a load-based cap. In addition, every effort should be made to develop a WREGIS-based tracking and reporting system for GHG emissions that can be utilized on a regional basis.

- **Whether the intent should be to design a reporting protocol that could be adopted directly by other states in the region and, if so, whether modifications to the Staff proposal would be needed for this purpose.**

AReM believes that it is appropriate to have a regional outlook in developing a system for tracking and reporting GHG emissions, and AReM strongly urges the Commission and the CEC to work with agencies in other states to that end. Rather than attempt to develop a state-specific system for California that could then be adopted by other states, however, AReM recommends that the focus should be on modifying WREGIS so that this regional system can be used for GHG tracking and reporting, and for facilitating the regional trading of emissions allowances/credits.

Moreover, it should be explicitly recognized that many, if not most, of the complexities in the proposed reporting approach would go away if a larger, regional tracking and reporting infrastructure is developed. As there is a real potential for that prior to 2012, AReM would suggest a basic reporting outline (which may be similar to the historical reports that all LSEs

report for purposes of RAR each year) that would be necessary, and the other “adjusted all-in” reporting methodology proposed in the Joint Staff Report. Lastly, the Joint Staff Report should state how streamlined reporting could be done for LSEs that own no generation, such as ESPs and some CCAs.

- **How the proposed reporting requirements including, in particular, the use of estimates, could affect the integrity of greenhouse gas (GHG) emission allowances and whether the requirements may have implications on the ability to trade GHG emission allowances with other regimes.**

As noted above, AReM recommends that the focus should be on modifying WREGIS for use as a regional tracking and reporting system for GHG emissions, and for facilitating the trading of emissions allowances/credits, rather than developing and refining a system for California that could then be adopted by other states. Under either approach, however, the immediate focus should be on developing a tracking and reporting regime that can be used for the states and provinces located within the Western Electricity Coordinating Council (“WECC”) wholesale markets and which will allow for trading GHG allowances or credits across emission sectors to encourage economically efficient capture of GHG emission improvements wherever found.

- **Whether adoption of any part of the Staff proposal would require changes to any existing Public Utilities Commission and/or Energy Commission policies or the adoption of new policies by either agency.**

AReM believes that some changes in current policy may be required to implement the Staff Proposal and looks forward to reviewing the comments of other parties on this topic. The discussion regarding “contract shuffling” suggests that purchasing retail providers can NOT rely upon unit-specific or technology-specific contracts because the delivery of the low-GHG resource to serve California loads may result in some redispatch of higher-GHG resources. This may be a policy recommendation that is contrary to the unit- and technology-specific

requirements adopted for Resource Adequacy. Why is it that the adjusted all-in approach will recognize out-of-state entities retention of lower-cost (but higher-GHG emitting) resources for native load in its marginal analysis, but it would not permit or otherwise considers nefarious retail provider procurement of specifically identified lower-GHG resources for use by California loads? While AReM agrees with the description of the potential redispatch or reprioritization of lower-GHG production in order to provide California LSEs a premium environmental product, that type of action is exactly what should be expected when a new regulatory paradigm balkanizes the regional wholesale market, and it would be very counterproductive to suggest that action toward lowering procurement of high GHG emissions could result in sanctions.

Until the entire region operates with a similar regulatory mandate, the nature of interstate commerce is such that supplies will flow to demand. What the “contract shuffling” discussion suggests—market intervention on entities otherwise trying in good faith to comply with the new rules—is precisely the type of unintended consequence that the Joint Staff Report desires to avoid.<sup>7</sup> Presumably the entities with equity in the lower-GHG resources will see a future market value in such supplies and seek to develop more lower-GHG emission supplies. To penalize LSEs operating in the regional wholesale market or otherwise attribute to them—directly or indirectly—is patently unjust and uncalled for if the regulators are not in a position to revise the regional wholesale market rules.

- **In addition to any technical, policy, or other concerns, whether the Staff proposal raises any legal issues.**

AReM believes that some changes in the current law or review of legality will be required to implement the Staff Proposal and looks forward to reviewing the comments of other

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<sup>7</sup> See § 2.3.5, Joint Staff Report, page 7: “Minimization of Unintended Consequences”.



parties on this topic. One area in which a serious legal issue is implicated is Staff's proposal to address the potential problem so-called of "contract shuffling" by monitoring and potentially sanctioning LSEs for changing their procurement strategies. As previously noted, this proposal is unfair and potentially unlawful, particularly where alleged contract shuffling occurs "without knowledge or consent" of the retail provider, a possibility explicitly recognized in the Staff Proposal.<sup>8</sup> Any such sanctioning would require significant changes to the statutory enforcement powers of the CPUC (and/or the CEC).

- **Whether modifications to the Staff proposal would be needed to support implementation of the recommendations in the [MAC Report], in particular, the "first seller" structure.**

The Staff Proposal is premised on a load-based GHG emissions tracking and reporting system and thus appears to require significant modification to support a "first-seller" approach as recommended in the MAC Report. AReM recommends that the Commission and the CEC hold a joint workshop on this important topic.

### **III. COMMENTS ON STAFF PROPOSAL**

#### **A. Section 4.1.4 – The Proposed "Limiting Conditions" on Claims of Zero or Low Emissions for New Contracts with Existing Resources Are Unnecessary and Should Not Be Adopted.**

Staff's proposed "limiting conditions" for claims of low or zero emissions associated with new contracts with existing plants (Section 4.1.4) are unnecessary and unwarranted. Such claims will be verifiable by reference to data reported by suppliers to the CARB, as well as to the Federal Energy Regulatory Commission ("FERC") and other government agencies, and therefore should not be subject to any ex ante limitations. The concerns about so-called "contract shuffling" and leakage need to be looked at from the perspective of retail providers seeking

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<sup>8</sup> Joint Staff Report, pages 35-36.

economically efficient transactions that comport with various regulatory requirements. Since some LSEs have a customer base with a higher proportion of contestable customers, those LSEs are typically seeking to manage their procurement and regulatory risks in relation to firm and rationally expected customer commitments to them. Also, the reference to customers relocating to lower-cost states as “leakage” implies, without any foundation, the notion that those customers are somehow committed to California’s electric system. Additionally, from the description in the Joint Staff Report on “contract shuffling”, it appears to be more of an issue of asset redeployment in light of potential sales of a higher valued product (lower GHG resources) to California, as opposed to retail providers manipulating the market through submission of false transaction information.

Until the entire region operates with a similar regulatory mandate, the nature of interstate commerce is such that supplies will flow to the demand that values the technology the highest. What the “contract shuffling” and “limiting conditions” discussion suggests—market intervention on entities otherwise trying in good faith to comply with the new rules—is precisely the type of unintended consequence that the Joint Staff Report desires to avoid.<sup>9</sup> Presumably the entities with equity in the lower-GHG resources will see a future market value in such supplies and seek to develop more lower-GHG emission supplies. To penalize LSEs operating in the regional wholesale market or otherwise attribute disfavored behavior to them to them—whether directly or indirectly—is patently unjust and uncalled for, particularly where the regulators are not in a position to revise the regional wholesale market rules.

Moreover, Staff’s proposal to limit such claims to in-state resources or require demonstration that the contract pre-dated construction of the resource in question discriminates

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<sup>9</sup> See § 2.3.5, Joint Staff Report, page 7: “Minimization of Unintended Consequences”.

against energy service providers (“ESPs”), in that ESPs typically secure unbundled capacity and energy products to meet their load requirements. As ESPs typically do not have equity interests in any generation resources, the pre-construction contracting requirement is contrary to the competitive business environment that ESPs operate within. Indeed, the proposed limiting conditions could frustrate the legitimate efforts by ESPs (and other load-serving entities) to reduce their GHG emissions. For example, under Staff’s Proposal, the reduced GHG emissions from a new contract that meets the emissions performance standard might be disallowed under the limiting conditions and thus not recognized for purposes of demonstrating compliance with the load-based cap. To avoid these unnecessary complications and problems, AReM recommends that the proposed limiting conditions on such claims should not be adopted.

**B. Section 5.7 – The Difference in the Proposed Levels of GHG Emissions Attributed to “Unspecified Purchases” from the Northwest and Southwest Power Pools Will Be Problematic.**

Under the Staff Proposal, varying levels of GHG emissions are attributed to “unspecified purchases” from different markets and power pools (Section 5.7). While this approach may have some advantages over others, it greatly increases complexity and carries its own problems in the form of unintended consequences. For example, attributing higher GHG emissions to unspecified purchases from the Southwest power pool compared to the Northwest pool creates an incentive for LSEs to maximize purchases from the latter, thereby potentially exacerbating transmission congestion problems on the north-south intertie, . The report appears to make an unsupported assumption that current intertie usage patterns would not change, or that changes in those patterns are indicative of “contract shuffling” that should be punished. Moreover, a critical issue for ESPs (as entities that rely primarily—if not exclusively—on wholesale market transactions to serve their loads), is the process for determining what region to attribute

unspecified sales. Should all purchased delivered into NP 15 (or a similar in-state trading hub under MRTU), for example, be assumed the NW emission profile, or a Northern CA emission profile? Since the attribution step will be a significant action for ESPs (who under the adjusted all-in process are likely to be reflecting 100% purchased power), the Staff Proposal should outline the mechanics for making attributions for a number of in-state locations as well as inter-control area tie point.

Similarly, some of the other emission attributions should be the subject of greater review. For example, the presumption that CAISO real-time energy is the lowest GHG emission may be based on an oversimplifying assumption that ignores the contribution from mismatches in scheduled demand and energy associated with provision of ancillary services such as spinning reserves and automatic generation control. Further, this low attribution could have the unintended consequence of creating more pressure for real-time transactions—contrary to California policy goals to minimize use of real-time transactions.

**C. Section 7.3.2 – Reporting Requirements for Specified Purchases from Out-of-State Resources Should Be Simplified.**

Staff's proposal to require all LSEs to include additional detailed information in their annual compliance reports about out-of-state resources (net generation, fuel-consumption data, emission and oxidation factors, and GHG emissions) would impose significant administrative burden on ESPs, which unlike the IOUs are not able to recover their compliance costs from captive customers through Commission-approved default tariff rates. It is also unnecessary to require this additional level of detail be reported by LSEs, as suppliers already report such information to the CARB, FERC and/or other federal agencies. Accordingly, AReM

recommends that the reporting requirements with respect to specified purchases from out-of-state resources be the same as for in-state resources.<sup>10</sup>

**D. Section 8.3 – Verification Program Requires More Information and Opportunity to Review and Comment.**

The verification suggestion in § 8.3 should be expanded and additional opportunity for comment provided. ARB has just outlined an initial proposal for supply-side report verification. AReM is concerned that a requirement to hire an independent third party verification to audit transactions and verify submitted emission reports will impose significant costs and complexity on ESP operations. Additional details need to be provided so that the balance of benefits and burdens can be weighed, particularly of this complexity would be avoided through the development of a regional GHG tracking and reporting program.

**E. Section 9 – The Commission Should Clarify That Retail Sellers Will Not Be Held Accountable for “Contract Shuffling” By Suppliers.**

Staff proposes to address the potential problem of so-called “contract shuffling” by monitoring and potentially sanctioning LSEs for changing their procurement strategies (Section 9). However, as discussed previously, there are serious legal and implementation issues that arise with the proposal. First, it is not clear from a legal standpoint under the CPUC or CEC statutory authorities that sanctions for actions outside the knowledge or control are permissible. Such strict liability standards—without any reference to intent or knowledge—are simply unjust and should not be considered. Second, it is poor policymaking to direct entities to execute unit- or technology-specific contracts for purposes of certain policies (such as resource adequacy and GHG emission regulations), and then to penalize LSEs that seek to optimize procurement in

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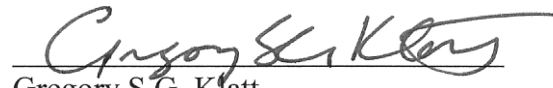
<sup>10</sup> AReM notes that in § 7.3.6 the use of “delivery point” and “receipt point” are backwards. Sellers provide energy at the delivery point where purchasers receive the power, and those points may not be explicit to a particular bus or substation. For example, wholesale transactions regularly occur where the delivery point is simply “NP 15”. It is not apparent whether the terms are similar to the confusion over “imports” and “exports” that occurred during the April workshops.

compliance with multiple regulatory requirements. Accordingly, the Commission should clarify that LSEs will not be held accountable for any “contract shuffling” on the part of their suppliers without any conclusive evidence that this occurred with the LSE’s knowledge and intent.

#### **IV. CONCLUSION**

For the foregoing reasons, AReM urges the Commission to adopt the Staff Proposal on an interim basis only, and to modify the staff’s recommendations as detailed herein.

Respectfully submitted,



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Date: July 2, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing document on all parties of record in the above captioned proceedings by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on July 2, 2007, at Arcadia, California.

  
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